REMARKS

In accordance with the foregoing, independent claims 1, 5, and 9 are amended to include features respectively, from claims 2, 6, and 10 that are cancelled herein without prejudice or disclaimer. Dependent claims are amended accordingly. Independent claims 13-18 are similarly amended.

No new matter is presented in any of the foregoing and, accordingly, approval and entry of the amended claims are respectfully requested

Claims 1, 3-5, 7-9, and 11-18 are pending. The rejections are traversed and reconsideration is requested.

ITEM 3: ALLOWABLE SUBJECT MATTER

The Action indicates that claims 4, 8, and 12 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicants thank the Examiner for the indication of allowable subject matter. However, claims 4, 8 and 12 are not rewritten at this time since patentability is submitted to reside in the independent claims 1, 5, and 9 from which claims 4, 8, and 12 respectively depend.

ITEM 2: REJECTION OF CLAIMS 1, 3-5, 7-9, AND 11-18 UNDER 35 U.S.C. 103(a) AS BEING UNPATENTABLE OVER MUKOYAMA ET AL. (U.S.P. 6,831,659 B1) IN VIEW OF PALM (U.S.P. 5,742,291)

Claims 1-3, 5-7, 9-11, 13-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Mukoyama in view of Palm. The Action concedes that Mukoyama does not teach "moving the wireframe by dragging the wireframe."

As provided in MPEP §2143.03 "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F. 2d 1981, (CCPA 1974)."

Applicants submit that the art, alone or in combination, does not teach features recited by the claims.

Independent claims 1, 5, 9, and 13-18, all as amended, recite, respectively, an image simulation method for mapping a texture to a specified face of a three-dimensional image shown on a display, an image simulation apparatus, and an computer-readable storage, using claim 1 as an example, including "setting three axes that will be orthogonal to one another using a plurality of points of the three dimensional image in order to establish a three dimensional space on the three-dimensional image; establishing a target face, to which a texture will be mapped, on the

basis of a virtual surface which is set with the three axes of the three-dimensional space; determining initial values of a drawing start point for drawing the texture and number of drawing iterations so that the target face is fully mapped with the texture; drawing the target face with the texture mapped thereto on the display in accordance with the drawing start point and the number of drawing iterations; and drawing a wireframe which divides the target face mapped with-the texture on the display in accordance with the drawing start point and the number of drawing iterations, wherein in a case a movement of the wireframe is requested by dragging the wireframe on the display, a value of the drawing start point is changed in accordance with the amount of movement of the dragging the wireframe."

That is, a method is provided, for example, in a case of drawing a target face of a three dimensional image as an image having consecutive patterns, e.g., a brick wall of mapping texture elements regularly to the target face set on the three dimensional image. Values of a drawing start point are modified during drawing iterations so as to display the target face with consecutive patterns as desired by the user.

Mukoyama merely teaches (see, for example, col. 15):

> a direction of mapping be altered randomly for every display element P. If such a technique as this is adopted, the leaf clusters will be displayed in different shapes, making it therefore possible to represent extremely natural trees even though identically shaped texture data are used. To each apex configuring a display element P is set a weighting coefficient for defining the linear interpolation of the brightness.

That is, Mukoyama teaches a technique to deploy random flat texture elements that are changed in brightness for drawing images of forms having indistinct shapes, e.g., flames, smokes, and clouds.

Further, Mukoyama and Palm do not teach, alone or in combination, "setting three axes that will be orthogonal to one another using a plurality of points of the three dimensional image in order to establish a three dimensional space on the three-dimensional image."

Mukoyama merely teaches setting a weighting coefficient for defining the linear interpolation of the brightness of texture element.

In an example case, using the methods taught by Mukoyama and/or Palm, texture elements are mapped to a target face on virtual surfaces set with three axes that will be orthogonal to one another in a three-dimensional space. If a mapping texture element causes a misalignment on an edge of virtual surfaces, such a misalignment would not be adjusted by changing the value of weighting coefficient in a method as taught by Mukoyama.

In addiction, Mukoyama and Palm, alone or in combination, do not teach a method,

apparatus, or storage "wherein in a case a movement of the wireframe is requested by dragging the wireframe on the display, a value of the drawing start point is changed in accordance with the amount of movement of the dragging the wireframe."

That is, they do not teach a user can change how to deploy texture elements mapped to the target face according to the user's instruction.

Mukoyama merely teaches a technique to draw images changing a brightness of images according to movement of viewpoint. Palm merely teaches (see, for example, col. 5) capturing wire frames of images.

Conclusion

Since recited features of claims 1-3, 5-7, 9-11, 13-18 are not taught by the cited art, alone or in combination, the rejection should be withdrawn and claims 1-3, 5-7, 9-11, 13-18 allowed.

CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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